



201-15805

CYTEC INDUSTRIES INC.

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October 3, 2003

US Environmental Protection Agency
PO Box 1473
Merrifield, VA 22116
Attention: Chemical-Right-To- Know Program/ Mr. Richard Hefter

Dear Mr. Hefter:

In keeping with Cytec's 1999 commitment to the EPA High Production Volume Voluntary program, we have previously submitted a robust summary and test plan for CAS # 2778-42-9, Isocyanic acid, m-phenylenediiso-propylidene. We have reviewed EPA's comments regarding our submission and responded to them. Subsequently, we have received comments from other stakeholders. As a result of this additional input, we wish to make a change to our previously filed comments. We still intend to conduct the following studies:

- Hydrolysis- as per OECD TG 111
- Water solubility- if hydrolysis is found to be slow, we intend to conduct a water solubility study as per OECD TG 105). If hydrolysis is rapid, we believe that our modeled data is accurate and appropriate.
- In-vitro chromosomal aberrations as per OECD 473

We wish to modify our comments to replace the proposed OECD 414 study with an OECD 421 oral study. We feel this will adequately address developmental toxicity endpoints while reducing the number of animals used in this screening assessment. In addition, we plan on running an Embryonic Stem Cell assay. Our review of this assay indicates to us that validation work has been done mostly with pharmaceuticals. We feel that running this assay will allow us to add to the validation database.

Sincerely,

Randy Deskin, Ph.D., DABT
Director, Toxicology and Product Regulatory Compliance

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